

1 EDMUND G. BROWN JR.
Attorney General of California
2 MARC D. GREENBAUM
Supervising Deputy Attorney General
3 MICHELLE MCCARRON
Deputy Attorney General
4 State Bar No. 237031
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-2544
6 Facsimile: (213) 897-2804

7 *Attorneys for Complainant*

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

Case No. **2010-394**

12 **ARA GULOGLYAN**
13 **1325 N. Sierra Bonita Avenue, #Apt 209**
Los Angeles, CA 90046

A C C U S A T I O N

14 **Registered Nurse License No. 531934**

15 Respondent.
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18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
21 official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department
22 of Consumer Affairs.

23 2. On or about April 28, 1997, the Board of Registered Nursing (Board) issued
24 Registered Nurse License No. 531934 to Ara Guloglyan (Respondent). The Registered Nurse
25 License was in full force and effect at all times relevant to the charges brought herein and will
26 expire on March 31, 2011, unless renewed.

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1 "(f) Conviction of a felony or of any offense substantially related to the qualifications,
2 functions, and duties of a registered nurse, in which event the record of the conviction shall be
3 conclusive evidence thereof." [¶]

4 7. Section 2762 states:

5 "In addition to other acts constituting unprofessional conduct within the meaning of this
6 chapter it is unprofessional conduct for a person licensed under this chapter to do any of the
7 following:

8 [¶]

9 "(b) Use any controlled substance as defined in Division 10 (commencing with Section
10 11000) of the Health and Safety Code, or any dangerous drug or dangerous device as defined in
11 Section 4022, or alcoholic beverages, to an extent or in a manner dangerous or injurious to
12 himself or herself, any other person, or the public or to the extent that such use impairs his or her
13 ability to conduct with safety to the public the practice authorized by his or her license.

14 "(c) Be convicted of a criminal offense involving the prescription, consumption, or
15 self-administration of any of the substances described in subdivisions (a) and (b) of this section,
16 or the possession of, or falsification of a record pertaining to, the substances described in
17 subdivision (a) of this section, in which event the record of the conviction is conclusive evidence
18 thereof."

19 REGULATORY PROVISIONS

20 8. California Code of Regulations, title 16, section 1444, states:

21 "A conviction or act shall be considered to be substantially related to the qualifications,
22 functions or duties of a registered nurse if to a substantial degree it evidences the present or
23 potential unfitness of a registered nurse to practice in a manner consistent with the public health,
24 safety, or welfare. Such convictions or acts shall include but not be limited to the following:

25 "(a) Assaultive or abusive conduct including, but not limited to, those violations listed in
26 subdivision (d) of Penal Code Section 11160."

27 [¶]

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1 lower chin. Los Angeles Police Officers arrested Respondent. Respondent was court ordered to
2 complete a 52-week Domestic Violence Program pay a fine of \$520.00, perform twenty-nine days
3 of community service, serve 90 days in jail and placed on probation for a period of 36 months
4 with terms and conditions.

5 **SECOND CAUSE FOR DISCIPLINE**

6 **(Dangerous Use of Alcohol)**

7 11. Respondent is subject to disciplinary action pursuant to Code sections 2761(a) and
8 2762(b), in that on or about May 3, 2006, Respondent used alcoholic beverages to an extent or in
9 a manner dangerous to himself, and others. Complainant refers to, and by this reference
10 incorporates, the allegations set forth in paragraph 10, subparagraph (a), as though set forth fully.

11 **THIRD CAUSE FOR DISCIPLINE**

12 **(Conviction Involving the Consumption of Alcohol)**

13 12. Respondent is subject to disciplinary action pursuant to Code sections 2761(a) and
14 2762 (c), in that on or about July 20, 2006, Respondent was convicted of a crime involving the
15 consumption of alcohol. Complainant refers to, and by this reference incorporates, the allegations
16 set forth in paragraph 10, subparagraph (a), as though set forth fully.

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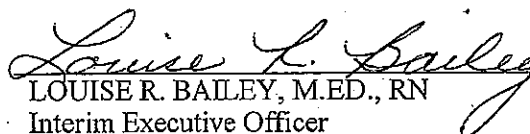
PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board issue a decision:

1. Revoking or suspending Registered Nurse License No. 531934, issued Respondent;
2. Ordering Ara Guloglyan to pay the Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and
3. Taking such other and further action as deemed necessary and proper.

DATED: _____

2/22/10



LOUISE R. BAILEY, M.ED., RN
Interim Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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